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01:39 PM, 20 Jun, 2025  
U.S.D.C., Eastern District of New York

Hon. Rachel P. Kovner  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Wen v. Tether Operations Limited – Clarification on Service and Address

Case No: (1:25-cv-03032-RPK-JAM)

Pro Se Plaintiff – Letter Regarding Filing Status and Alternative Service

Dear Judge Kovner:

I respectfully write as the pro se plaintiff in the above-referenced matter to follow up on the Court's Order dated June 16, 2025, in which my request to have the Court rule on my motion for alternative service prior to fee payment was denied, and an extension was granted until June 23, 2025 to pay the filing fee.

I confirm that I have now paid the required filing fee of \$405 as instructed.

However, upon attempting to finalize docketing through the Clerk's Office, I was informed that the Court requires a physical address for the defendant in order to proceed. Unfortunately, the defendant, Tether Operations Limited, does not disclose any physical business address on its official website or in public domain records. As explained in my Motion for Alternative Service (see Dkt. #16), Tether operates a digital-only structure and has publicly designated **inforequests@tether.to** as its official law enforcement and emergency communication channel (see Complaint Exhibit D).

This situation places me in a procedural bind: although I have now paid the filing fee in full, I am unable to provide a physical address for service, and must therefore respectfully reiterate my request that the Court now consider my Motion for Alternative Service pursuant to **FRCP 4(f)(3)**.

I also wish to clarify that the reason I initially hesitated to pay the filing fee was not due to bad faith or delay, but because I reasonably believed that the viability of my case depended on the Court's approval of substituted service. I was concerned that without such permission, service would be impossible and the case would be dismissed for lack of service — despite full documentation of the theft and the defendant's refusal to cooperate. I followed the Court's instructions in good faith and now seek only to move forward properly.

This request is consistent with past precedent in this Circuit – notably, **SEC v. Telegram Group Inc., 19-cv-9439 (SDNY)** – where Judge Castel permitted service via email due to the defendant's lack of U.S. address, digital-only operations, and demonstrated email responsiveness. The parallels in my case are clear and well-supported in the Motion and exhibits already submitted.

I respectfully ask that the Court permit the case to proceed and rule on my pending Motion for Alternative Service via email. I remain available to provide further information if requested.

Thank you for your time and consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'XingShun Wen', with a stylized flourish at the end.

XingShun Wen (Pro Se Plaintiff)

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Dated: June 20, 2025